

**REMARKS**

Claims 1-22 are pending in this application. By this Amendment, claims 1, 8, 13 and 17 are amended and claim 22 is added. No new matter is added. Reconsideration and withdrawal of the rejection are respectfully requested.

Applicants appreciate the courtesies shown to Applicants' representative by Examiners Shikhman and Wu in the October 11, 2007 personal interview. Applicants' separate record of the substance of the interview is incorporated into the following remarks.

Entry of the amendments is proper under 37 C.F.R. §1.116 because the amendments: (a) place the application in condition for allowance (for the reasons discussed herein); (b) do not raise any new issue requiring further search and/or consideration (as the amendments amplify issues previously discussed throughout prosecution); and (c) place the application in better form for appeal, should an appeal be necessary. Entry of the amendments is thus respectfully requested.

**I. The Claims Define Patentable Subject Matter**

The Office Action rejects claims 1-21 under 35 U.S.C. §103(a) over U.S. Patent No. 5,887,073 to Fazzari et al. (Fazzari) in view of publication "Mixed raster content (MRC) model for compound image compression" to Queiroz et al. (Queiroz). This rejection is respectfully traversed.

Independent claim 1 recites, *inter alia*, "a blob clusterer that assigns the blobs to one or more binary foreground planes and a grayscale background plane based on the color index of each of the blobs to generate N-layer image data" and "a blob identification module to maintain a global table of blobs that are no longer active." Claims 13 and 17 recite similar subject matter. Independent claim 8 recites, *inter alia*, "assigning the blobs to one or more binary foreground planes and a grayscale background plane based on the color index of each of the blobs to generate N-layer image data" and "maintaining a global table of blobs that are

no longer active." Support for the amendment can be found in the specification at, for example, paragraphs [0063] and [0102].

As discussed during the October 11, 2007 personal interview, the passage of Fazzari relied on for disclosing the blob clusterer merely shows a background attribute image converted into a binary background and fails to teach or suggest a grayscale background plane and the generation of N-layer image data. Furthermore, Fazzari fails to teach or suggest a blob identification module to maintain a global table of blobs that are no longer active. Queiroz fails to cure the deficiencies of Fazzari. Accordingly, the applied references, alone or in combination, fail to teach or suggest the recited features of independent claims 1, 8, 13 and 17.

For at least these reasons, independent claims 1, 8, 13 and 17 and the claims dependent therefrom, are patentable over the applied references. Withdrawal of the rejection of the claims is respectfully requested.

## **II. Claim 22**

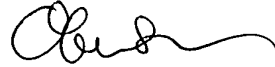
Claim 22 is added. Support for newly added claim 22 can be found in the specification at, for example, paragraph [0105]. Claim 22 is patentable at least in view of the patentability of claim 1, from which it depends, as well as for the additional features it recites.

## **III. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of the pending claims are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted, \*



James A. Oliff  
Registration No. 27,075

Obert H. Chu  
Registration No. 52,744

JAO:OHC/mdw

Attachment:  
Amendment Transmittal

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**OLIFF & BERRIDGE, PLC**  
**P.O. Box 19928**  
**Alexandria, Virginia 22320**  
**Telephone: (703) 836-6400**

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